

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

DAVELL ARTIS; DONTRA ARTIS;
MICHAEL BLUNT; RONNELL
BROTHERS; BRANDON CAMPBELL;
JERRY COOK; BOBBY HARDY;
HUSAMIDDIN MUBASHSHIR;
GABRIEL JIMENEZ; ALFREDO
LEBRON DIAZ; WILFREDO LEBRON-
DIAZ; ERIQUE INGRAM; RAMELL
MCDONALD; MICHAEL PERRY;
ROBERT THOMAS, SR.; ROBERT
THOMAS, JR.; TAVARIS TILLERY;
EDWARD WASHINGTON; and JAMES
WILLIAMS,

Plaintiffs,

v.

Case No.: 2:17-CV-595

LYON SHIPYARD, INC.

Defendant.

**UNOPPOSED MOTION TO EXTEND PLAINTIFFS DISCOVERY COMPLETION
DATE TO TAKE A SINGLE DEPOSITION**

Defendant Lyon Shipyard, Inc. ("Lyon Shipyard"), by counsel, pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Rule 16(B) of the Local Rules for the United States District Court for the Eastern District of Virginia, hereby moves this Court for the entry of an order modifying the Rule 16(b) Scheduling Order entered in this cause (ECF No. 36) ("Scheduling Order") to allow Plaintiffs to take the deposition of the Vice President in charge of production at Lyon Shipyard, Johnny Gaskins, outside of the date that Plaintiffs are required to complete discovery. Lyon Shipyard states the following in support of its Motion:

1. On March 20, 2018, the Court entered the Rule 16(b) Scheduling Order in this cause, which requires the Plaintiffs to complete discovery on or before August 21, 2018

(“Plaintiffs’ Discovery Completion Date”).

2. Plaintiffs wish to take the deposition of Johnny Gaskins, the Vice President in charge of production at Lyon Shipyard, but due to scheduling problems encountered caused in part by Mr. Gaskins travel schedule, the Parties have been unable to schedule the deposition before Plaintiffs’ Discovery Completion Date. The Parties are in agreement that the counsel for the Plaintiffs may take the deposition of Mr. Gaskins on August 28, 2018.

3. The Parties are in agreement for the Court to enter an order modifying the Scheduling Order to allow Plaintiffs to take the deposition of Mr. Gaskins on August 28, 2018. The form of a proposed Order is attached hereto as **Exhibit A**.

4. Lyon Shipyard submits that there is good cause for this Court to enter the order modifying the Scheduling Order to allow Plaintiffs to take the one deposition of Mr. Gaskins.

WHEREFORE, the Defendant, Lyon Shipyard, Inc., by counsel, respectfully requests that this Court enter the Order in the form attached hereto.

RESPECTFULLY SUBMITTED,

LYON SHIPYARD, INC.

By: /s/ Ray W. King
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of March, 2018, I will electronically file the foregoing Unopposed Motion To Extend Plaintiffs Discovery Completion Date To Take A Single Deposition with the Clerk of Court using the CM/ECF system, which will then send notification of such filing (NEF) to all counsel of record:

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